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UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
MISSOULA DIVISION

TANYA GERSH,

*Plaintiff,*

v.

ANDREW ANGLIN,

*Defendant.*

Case No. 9:17-cv-00050-DLC-KLD

**PLAINTIFF'S MOTION TO  
HOLD DEFENDANT ANDREW  
ANGLIN IN CONTEMPT OF  
THIS COURT'S FEBRUARY 7,  
2022 ORDER AND TO  
ENFORCE DISCOVERY  
PURSUANT TO THAT ORDER**

Upon the accompanying Declaration of Robert N. Kravitz and all of the proceedings had herein, Plaintiff Tanya Gersh, by her undersigned counsel, hereby moves this honorable Court for an order holding Defendant Andrew Anglin in contempt of this Court's February 7, 2022 order and to enforce discovery pursuant to that order, and to issue such sanctions as the Court deems just and proper, for Anglin's failure to respond to Plaintiff's post-judgment discovery requests in violation of this Court's February 7, 2022 order, pursuant to Rule 37 of the Federal Rules of Civil Procedure and this Court's inherent contempt power. A proposed order and memorandum in support of this motion have also been filed.

DATED March 25, 2022

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

BY:

/s/Daniel J. Kramer  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this date the foregoing document was filed with the clerk of court for the United States District Court of Montana through the Court's CM/ECF filing system, and by virtue of this filing notice will be sent electronically to all counsel of record.

I further certify that on this date I caused a copy of the foregoing document to be served via U.S. Mail upon the following party:

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DATED: March 25, 2022

/s/Daniel J. Kramer

Attorney for Plaintiff Tanya Gersh  
on behalf of all Attorneys for Plaintiff